

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

1. STATE OF OKLAHOMA, ex rel.)
W.A. DREW EDMONDSON, in his capacity as)
ATTORNEY GENERAL OF THE STATE OF)
OKLAHOMA and OKLAHOMA SECRETARY)
OF THE ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the TRUSTEE FOR)
NATURAL RESOURCES FOR THE)
STATE OF OKLAHOMA,)

Plaintiffs,)

v.)

05-CV-0329 GKF-PJC

1. TYSON FOODS, INC.,)
2. TYSON POULTRY, INC.,)
3. TYSON CHICKEN, INC.,)
4. COBB-VANTRESS, INC.,)
5. AVIAGEN, INC.,)
6. CAL-MAINE FOODS, INC.,)
7. CAL-MAINE FARMS, INC.,)
8. CARGILL, INC.,)
9. CARGILL TURKEY PRODUCTION, LLC,)
10. GEORGE'S, INC.,)
11. GEORGE'S FARMS, INC.,)
12. PETERSON FARMS, INC.,)
13. SIMMONS FOODS, INC., and)
14. WILLOW BROOK FOODS, INC.,)

Defendants.)

MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE*

Come now the separate Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, by their attorneys Rhodes, Hieronymus, Jones, Tucker & Gable, PLLC, and pursuant to LCvR 83.2(g) and 83.3 move this Court for admission of Colin C. Deihl to appear *pro hac vice* in this case as out-of-state counsel for Cargill, Inc. and Cargill Turkey Production, LLC, on the following grounds:

1. The undersigned John H. Tucker is counsel of record for Defendants Cargill, Inc. and Cargill Turkey Production, LLC in these proceedings. John H. Tucker will continue to serve as counsel to Defendants Cargill, Inc. and Cargill Turkey Production, LLC in these proceedings.

2. Pursuant to LCvR 83.2 (g), attached to this Motion as Exhibit 1 is the completed request form of Colin C. Deihl.

3. Mr. Deihl is a member in good standing of the bar of Colorado. *See* Exhibit 1.

4. The proposed admittee understands that, upon admission *pro hac vice*, he shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understands that admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

6. Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court.

WHEREFORE Defendants, Cargill, Inc. and Cargill Turkey Production, LLC respectfully request that this Court grant this application for out-of-state attorney Colin C. Deihl to appear *pro hac vice* before this Court on behalf of Defendants Cargill, Inc. and Cargill Turkey Production, LLC, and enter the proposed Order submitted herewith.

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

BY: s/ John H. Tucker

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ATTORNEYS FOR CARGILL, INC. AND CARGILL TURKEY
PRODUCTION LLC

CERTIFICATE OF SERVICE

I certify that on the 6th day of April 2009, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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I also hereby certify that I served the attached documents by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

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INC., TYSON POULTRY, INC.,
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COBB-VANTRESS, INC.**

s/ John H. Tucker